

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

SARAH TOWNSEND,	)	
Plaintiff,	)	
vs.	)	No. 4:19-cv-02798
	)	
T. WILLIAMS,	)	
Defendant.	)	

MEMORANDUM IN SUPPORT  
OF REQUEST FOR ADDITIONAL TIME  
TO ANSWER OR OTHERWISE RESPOND

Defendant's counsel has only recently entered on the case and not had adequate time to review the Complaint and obtain any other information that might be necessary file in order to draft and file a response to Plaintiff's Complaint. This request is not made for the purpose of hindrance or delay of the judicial process and will result in no prejudice or surprise to any party.

Wherefore, Defendant respectfully requests this Court grant and sustain this Motion, granting him up to and including December 4, 2019 within which to submit an Answer or other responsive pleading.

MARK H. ZOOLE

/s/Mark H. Zoole  
Mark H. Zoole  
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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on all counsel of record, including Anthony Rothert and Jessie Steffan, 906 Olive, Ste. 1130, St. Louis, MO, 63101, [arothert@aclu-mo.org](mailto:arothert@aclu-mo.org) and [jsteffan@aclu-mo.org](mailto:jsteffan@aclu-mo.org), and Gillian Wilcox, 406 West 34<sup>th</sup> St., Ste. 420, Kansas City, MO, 64111, [gwilcox@aclu-mo.org](mailto:gwilcox@aclu-mo.org), and Lisa Hoppenjans, Campus Box 1120, One Brookings Dr., St. Louis, MO, 63130-4899, [lhoppenjans@wustl.edu](mailto:lhoppenjans@wustl.edu) on this 13<sup>th</sup> day of November, 2019.

/s/Mark H. Zoole \_\_\_\_\_